

Exhibit 2

Judge Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IRENE RIGGS, an individual,

Plaintiff,

vs.

LIFE CARE CENTERS OF AMERICA, INC.,
a Tennessee Corporation,

Defendant.

Civil Action No. 2:16-cv-01525 TSZ

DEFENDANT'S DISCLOSURE OF EXPERT
WITNESSES

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) and the Court's Scheduling Order, Defendant Life Care Centers of America, Inc. ("Life Care") designates the following expert witness to testify on its behalf:

1. Demetria Haffenreffer, RN, Haffenreffer & Associates, 10050 NW Ash Street, Portland, OR 97299; (800) 733-6590. A copy of Ms. Haffenreffer's Expert Opinion dated May 24, 2017, is attached hereto as Exhibit A, and a copy of her CV is attached as Exhibit B.

1
2 Dated: May 26, 2017

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/Benjamin J. Stone

3 By _____
4 Benjamin J. Stone, WSBA #33436
5 Benjamin.Stone@lewisbrisbois.com

/s/John T. Bender

6 By _____
7 John T. Bender, WSBA #49658
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11 206-436-2020 / 206-436-2030 Fax
12 Attorneys for Defendant Life Care
13 Centers of America, Inc.
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DECLARATION OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the foregoing Defendant's Disclosure of Expert Witnesses to be served via the method below on this 26th day of May, 2017, on the following counsel/party of record:

<i>Plaintiff's Counsel</i> George O. Tamblyn Gregory M. Skidmore Mercer Island Law Group, PLLC 2448 76th Avenue SE, Suite 100 Mercer Island, WA 98040	<input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input type="checkbox"/> via CM/ECF <input checked="" type="checkbox"/> via E-mail: gtamblyn@mercerlg.com gskidmore@mercerlg.com
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s/Linda Morlin
Linda Morlin, Legal Secretary

Exhibit A



Expert Opinion

Irene Riggs v. Life Care Centers of America, Inc.

May 24, 2017

I am a RN and own a nursing home consulting company in Portland, Oregon. I have over forty years' experience in the nursing home field, as a Director of Nursing, an educational consultant and for the past thirty years as a consultant specializing in regulatory compliance. I serve providers in both Skilled and Community Based Care (Assisted Living and Residential Care) settings. I have served as an AHCA Quality Award Baldrige Examiner and have served on multiple quality committees for local and national organizations, including the expert Nursing Home panel of the Oregon Patient Safety Commission and the steering committee of MOVE (Making Oregon Vital for Elders), a subsidiary of the Pioneer Network, a Nursing Home culture change organization. I am certified as a Positive Approach to Care (PAC) Dementia Care Trainer. I currently serve on the Quality Improvement Committee of the Washington Health Care Association. I have provided education on Long Term Care topics, specifically related to abuse and abuse reporting and investigations in multiple States including Idaho. I am familiar with the Federal and State Requirements governing care and services in Skilled and Assisted Living facilities in the State of Idaho. Please see my attached Curriculum Vitae for detailed information related to my education, professional experience, trainings, and publications.

If I am provided additional materials I reserve my right to amend my opinion based on further review of clinical records I am provided.

My conclusions are based upon my review of the records and files provided to me and listed below:

1. Complaint
2. Letter to Tamara M. West, Investigator Equal Employment Opportunity Commission, from Lewis Brisbois Bisgaard & Smith Attorney Benjamin Stone
3. Plaintiff's first set of interrogatories and requests for production
4. Answer and affirmative defenses of defendant
5. Life Care abuse investigation including a summary of events and staff interviews
6. Statements from Irene Riggs
7. Life Care emails

8. Termination documentation
9. Clinical record documentation for Mr. James Loosemore
10. Staff education
11. Life Care Code of Conduct
12. Training certificates for Irene Riggs and acknowledgement by Irene Riggs of receipt and understanding of Life Care Code of Conduct that includes definitions of abuse

Background

On January 8, 2016, Irene Riggs, Executive Director, was called to Mr. Loosemore's room by nursing staff as a result of his yelling and aggressive behavior towards staff and his roommate. His behaviors included swearing and turning his TV volume up. Mr. Loosemore suffers from multiple sclerosis and as a result is unable to move from the waist down. As a result of Mr. Loosemore's refusal to lower the volume his TV when she asked him to do so, Irene Riggs admitted she told Mr. Loosemore "we're not going to play that game," unplugged his TV, and told him he could watch TV when was willing to watch it at a proper volume. Additionally, witnesses overheard Ms. Riggs read an involuntary discharge notice to Mr. Loosemore. When Ms. Riggs later returned to the room and found Mr. Loosemore asleep, she plugged his TV back into the socket. Ms. Riggs also informed other staff that they were permitted to unplug Mr. Loosemore's TV if he refused to lower the volume in response to a request. As a result, a staff member subsequently turned Mr. Loosemore's TV off a second time after he refused to lower the volume. An abuse report was made to Life Care that resulted in suspension of Irene Riggs pending the results of an abuse investigation conducted by Life Care Management staff. Irene Riggs' employment was subsequently terminated on February 1, 2016, when the abuse complaint was substantiated. In addition, information obtained from the State of Idaho, Office of the Ombudsman for the Aged, confirmed that, contrary to Ms. Riggs' statements to staff, they had not approved her course of action. The episode is well documented by Irene Riggs statements and additional staff statements. In addition, Life Care was required to rescind the discharge notice to Mr. Loosemore and move him into a private room. Staff was also required to be instructed that unplugging a resident's TV is not an acceptable response to an incident such as the one involving Mr. Loosemore.

Irene Riggs alleges Life Care Centers of America, Inc terminated her employment for retaliation as a result of her complaints of sexual harassment in November 2015 and not due to the abuse complaints.

Life Care of Sandpoint alleges Irene Riggs' employment was terminated on February 1, 2016 for a substantiated abuse claim, where she verbally and mentally abused a resident in her care and not as a result of retaliation.

Opinion

Through her actions that are well documented and affirmed by Irene Riggs herself, Irene Riggs verbally and mentally abused James Loosemore. Unplugging the TV of a resident who lacks mobility due to his refusal to lower the volume constituted mental abuse of a resident. She made matters worse by instructing other staff, inappropriately, that it was permissible to unplug his TV if he refused to cooperate in setting the volume of the TV. It is my opinion, that through the actions of Irene Riggs, in establishing a behavioral intervention without thoroughly assessing and exploring other alternatives, staff members unwittingly caused abuse to Mr. Loosemore. Ms. Riggs further engaged in mental abuse of Mr. Loosemore by reading him the involuntary discharge notice when he had not engaged in any actions that would require his involuntary discharge from the facility.

The Idaho Requirements for Assisted Living Facilities requires the Administrator of an Assisted Living facility to ensure the policies and procedures of his/her facility are implemented, including those policies and procedures governing abuse. Life Care Centers requires the Administrator to follow the Code of Conduct. It is my opinion, Irene Riggs, as the leader and Executive Director of the facility, had a duty to be a model of behavior related to the requirements as well as the Code of Conduct set by Life Care Centers of America.

The Idaho State Requirements at 16.03.22 Residential Care or Assisted Living Facilities in Idaho, defines abuse as, "The non-accidental act of sexual, physical or mental mistreatment, or injury of a resident through the action or inaction of another individual." The event of January 8, 2016, of unplugging Mr. Loosemore's TV, by these definitions represented mental mistreatment of Mr. Loosemore. The event was reportable by Idaho requirements and required thorough investigation.

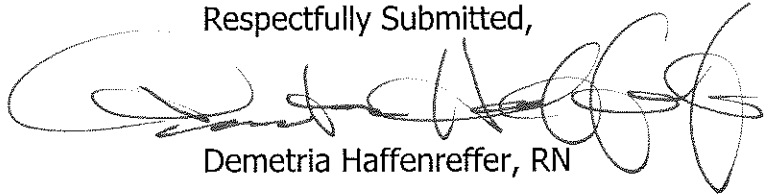
The requirements at 16.03.22 include requirements for management of behaviors that include, identifying and evaluating behaviors, guidelines for conducting behavioral reviews, and implementing the least restrictive interventions. Implementing an intervention such as the one Irene Riggs implemented, unplugging the TV, was not based on an evaluation, alternatives were not explored and the intervention was not the least restrictive. It is my opinion, the lack of evaluation and the implementation of a hasty intervention such as unplugging the TV represented an abusive behavior on the part of Irene Riggs.

Irene Riggs was an experienced Executive Director who was trained on abuse and Life Care's Code of Conduct; and she acknowledged that training through her signature. She acknowledged she implemented the intervention of unplugging the TV for Mr. Loosemore. Staff members corroborated the intervention and the events that led up to the intervention.

Based on my extensive experience with and knowledge of the requirements and with reasonable certainty, Life Care Centers of America acted within standards and the requirements by suspending Irene Riggs, conducting a comprehensive investigation and subsequently terminating Irene Riggs for a substantiated abuse claim.

It is my opinion Life Care had no recourse but to terminate Irene Riggs as her actions represented abuse and therefore abuse was substantiated.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Demetria Haffenreffer", written over the typed name.

Demetria Haffenreffer, RN

Exhibit B

DEMETRIA P. HAFFENREFFER, RN, MBA

10050 NW Ash St. • Portland, OR 97229

(503) 297-2732 • FAX (503) 297-5638 • demi@consultdemi.net

POSITIONS HELD

July 1985 - Present	President/Owner Haffenreffer & Associates, Inc., Portland, OR Haffenreffer & Associates consults & provides Educational Services to long-term care & community based care facilities nationwide. Specializing in regulatory compliance, it has assisted over 400 facilities out of decertification since 1989. In addition to provided crisis management, three basic services are offered to the Long Term Care, Hospital and Assisted Living Facilities: Corporate Compliance and quality program implementation & audits, including billing & presurvey audits; Policy & Procedure Development; & Workshops, Courses & Course Materials. Haffenreffer & Associates has provided expert analysis, advice & testimony to attorneys since 1990.
January 2014-Present	Member Quality Improvement Committee Washington Health Care Association, Tumwater, Washington
June 2007 – June 2009	Chief Quality Officer Avamere Health Services, Inc., Wilsonville, OR On contract & responsible for the development of quality systems & corporate compliance programs throughout the entire organization.
December 2006 – 2007	Member Survey and Certification Task Force American Association of Homes and Services for the Aging
December 2005 – June 2011	Master Quality Award Board Examiner (Baldrige Criteria) American Health Care Association
January 2002 – December 2009	Member Quality Improvement Committee American Health Care Association AHCA represents 12,000 non-profit and for-profit assisted living, nursing facility, long-term care and sub acute care providers nationwide.
January 1990 - September 1993	Vice President, Member of Board of Directors Oregon Health Care Association, Portland, OR

WORK EXPERIENCE

January 1984 - July 1985	Educational Coordinator North Shore Employment & Training, Salem, MA submitted grant proposal and won State of Massachusetts funding for a program to train and certify Nursing Assistants and Home Health Aides, drawing students from welfare and low-income families.
September 1982 - December 1983	Geriatric Nurse Leader Addison Gilbert Hospital, Gloucester, MA Implemented and coordinated the development of a geriatric module within a hospital setting.
March 1979 - September 1982	Educational Coordinator Cushman Management Associates, Danvers, MA Responsible for all the educational programs and workshops in six Long Term Care Facilities and one Home Health Agency for professional and paraprofessional staff.
January 1973 - November 1978	Director of Nursing River Terrace Healthcare, Lancaster, MA

EDUCATION

1977 - 1980	Masters Business Administration Boston University, Boston, MA
1974 - 1977	BS Nursing N.Y.U. External Degree Program, Albany, NY
1967 - 1970	Diploma in Nursing Truesdale Hospital School, Fall River, MA

DEMETRIA P. HAFFENREFFER, RN, MBA

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PROFESSIONAL CERTIFICATIONS, HONORS, PUBLICATIONS

April 2011	“A Model Program for Quality Performance – Steadfast gains in Quality, Safety & Business” Co-authored with Colorado Foundation for Medical Care and Abt Associates.
September 2009	Oregon Health Care Association <i>Special Service Award for Quality</i> .
December 2004	Certification Conflict Resolution and Mediation Marylhurst University
June 2003	<u>Provider Magazine</u> : “Radiating Excellence – Exceptional Nurse Leadership”
2002	Leadership Excellence Self-Assessment Program Facilitator American Healthcare Association
1999	Certified Healthcare Mediator American Health Lawyers Association
1992	"Restorative Care - Policy & Procedures" Comprehensive Manual
1991	"Establishing Policy and Procedures for Quality Assessment and Assurance. A Manual for Long-Term Care Givers"
1991	<u>Provider Magazine</u> : "The Rewards of Restorative Care"
1991	OBRA Costing Study Contracted by Oregon Health Care Association to assist Oregon Senior and Disabled Services with a study to determine the cost of the OBRA regulations so Oregon facilities could be appropriately reimbursed.
1990; rev. 1993	"Restraints - Policy and Procedures: A Manual for Long-Term Care Facility Care Givers"
1990	Nursing Home Staffing Study Awarded grant from Oregon Senior and Disabled Services and performed study on the feasibility of establishing Standard Staffing to patient ratios in Nursing Facilities
1989	Certified Ericksonian Hypnosis
1988	Certified Neuro-Linguistic Master Practitioner
1984	Certified in Nursing Administration American Nurses Association RN, CNA #069191

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PRESENTATIONS GIVEN

Title	Date	Presented to
Mentoring Guide – Steps to Creating a Learning Organization	February 2016	Washington Health Care Association
QAPI Design–Selecting & Implementing Key System & Process Measures	February 2016	Washington Health Care Association
The Nature of Things: Sexuality in Long Term Care	January 2016	Maine Health Care Association
Survey-Prepare for; During; Post Survey; IDR	April 2015	Idaho Health Care Association
Leadership Excellence	January 2015	Georgia Health Care Association
Workforce Engagement and Excellence	September 2014	Montana Health Care Providers
Learning to Lead	September 2014	Mississippi Health Care Association
The Heart of QAPI	August 2014	Pioneer Network National Convention
QAPI-Designing, Implementing and Sustaining Excellence	July 2014	Idaho Health Care Association
CAA Review: Developing Functional, Resident-Centered Care Plan	November 2013	LeadingAge Oregon
QAPI-Designing, Implementing and Sustaining Excellence	October 2013	Oregon Health Care Association
Managed Risk: Proactive Strategies to Enhance Care/Prevent Losses	October 2013	California Assisted Living Association
Quality of Life & Quality of Care-Bringing the Two Concepts Together	September 2013	Montana Health Care Association
Dare to be Better-The Five Keys to Success at Work	September 2013	Providence Elderplace PCA Summit
Can this Fall be Prevented?	September 2013	National Assoc State Veterans Homes
CAA Review: Developing Functional, Resident-Centered Care Plan	August 2013	Maine Health Care Association
Managing Change: Continuously Improving Staff and Care	August 2013	Pioneer Network
Managed Risk: Proactive Strategies to Enhance Care/Prevent Losses	June 2013	LeadingAge Washington
A Systems-Based Approach to Performance Excellence	June 2013	NADONA
Practical Strategies to Improve Care and Reduce Hospital Transfers	May 2013	LeadingAge Oregon
The Pen is Mightier than the Sword	May 2013	American Health Information Association
Managed Risk: Proactive Strategies to Enhance Care/Prevent Losses	May 2013	Ohio Health Care Association
Behavioral Problems: Understanding, Preventing & Managing	April 2013	Concepts in Community Living
QAPI in Action–Utilizing QAPI Principles Antipsychotic Reduction	April 2013	LeadingAge Oregon
QAPI in Action–Utilizing QAPI Principles for Fall Prevention	April 2013	LeadingAge Oregon
Intimacy and Sexuality in Long-Term Care	April 2013	LeadingAge Oregon
QAPI Design & Implementation: The CMS Elements	April 2013	LeadingAge Oregon
Implementation Guidelines for Effective QAPI System	March 2013	LeadingAge New York
QAPI-Designing, Implementing and Sustaining Excellence	March 2013	Washington Health Care Association
Managing Transitions and Change	February 2013	Oregon Center for Nursing
CQI for Community Based Care	October 2012	Maine Health Care Association
Interventions to Reduce Acute Care Transfers Using Interact II	September 2012	Oregon Health Care Association
A Systems Based Approach to Performance Excellence	May 2012	Leading Age of New York
Quality, Ethics & Compliance: Opportunities for Implementation	May 2012	Leading Age of New York
Managed Risk: Proactive Strategies to Enhance Care/Prevent Loss	March 2012	NCAL; Utah Health Care Association
Engage Staff to Improve Clinical Practice & Achieve Excellence	September 2011	Utah Health Care Association
Using the Baldrige Criteria to Engage your Workforce	September 2011	America Health Care Association
How to Decide: Critical Thinking, Intuition and Common Sense	September 2011	Leading Age of Oregon
CQI for ALF-Translating Survey Citations into QI Plans	September 2011	Washington Health Care Association
MDS 3.0 – Navigating the New MDS Landscape	March 2011	Montana Health Care Association
RUG's IV & Medicare – Optimizing Reimbursement	March 2011	MHCA and MT Health Care Providers
Navigating the New Regulatory Landscape	September 2010	DRI – The Voice of the Defense Bar
Using Baldrige Criteria for Workforce Excellence	August 2010	Pioneer Network
CQI – Managing Residents' Pain	2009	Oregon Health Care Association
Systems Approach to Performance Excellence	2009	America College of Nrsng Home Admins
Performance Excellence	2009 and 2010	Multiple Organizations
Leadership Excellence – Components of Effective QA	2009	Mt. States Consortium
Requirement & Guidance – Quality Of Life	2009 - Present	Oregon Alliance & Multiple Org.
Requirement & Guidance F314 – Pressure Ulcers	2008 – Present	Multiple Organizations
Requirements & Guidance F309 – Quality of Care	2008 - Present	Multiple Organizations
Requirements & Guidance F323 – Preventing Accidents	January 2008	Oregon Alliance for Senior Health Serv.
Bowel Management in the Elderly	1990 – Present	Fruit-Eze, Inc. (Various States)
Rethinking PPS	February 2006	Consonus – Oregon and California
Medical Directors: Strategies for Winning Partnerships	December 2005	Oregon Health Care Association
Notes from the Field – Keynote Speaker	October 2005	Qualis Health Care – Idaho Accord
Medical Directors: Strategies for Winning Partnerships	2005	Multiple Organizations
Proactive Risk Management Strategies	September 2005	Oregon Healthcare Assoc. Convention
New Survey Guidelines – F315 Urinary Incontinence	Summer 2005	Multiple State Association Conventions

DEMETRIA P. HAFFENREFFER, RN, MBA

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MAJOR TRAINING COURSES DEVELOPED

The Role of the Nurse in Community Based Care	A three day course for nurses working in Community Based Care focusing on Systems and Processes to ensure quality and compliance with State Requirements.
Navigating MDS 3.0 & CAA's RAI Training for Nursing Facility Staff	A fourteen hour course on how to complete all sections of the MDS 3.0 and rules pertaining to each section also includes the Care Area Assessment (CAA) Process, PPS schedule and how the MDS is used in the survey process.
Nursing Management in Long-Term Care	A twenty hour course for the LTC Nurse Manager focusing on the use of the Federal Interpretive Guidelines as a basis for developing Policy & Procedures which will ensure regulatory compliance and the development of a CQI program.
Survey Readiness – Putting your Best Foot Forward	A six hour course focusing on the impact of the MDS and RAPS on resident quality of care, survey outcomes, publicly reported Quality Measures and reimbursement.
Strategies for Understanding, Preventing and Managing Residents with Behavioral Problems	A six hour course for caregivers, licensed nurses and managers of behavioral and/or Alzheimer's units.
Medication Administration - Standards and Practices for Safe Administrations	A six hour course for Community Base Care focusing on the standards of practice for safe medication administration.
Performance Excellence – The Components of Excellence in CQI	A two-day intensive that provides practical in-depth treatment to basic and advanced techniques for CQI.
Step up to the Plate: Quality is your Business	A two-day intensive utilizing the Baldrige criteria as a foundation for exploring the key components of an effective quality improvement program (QAPI), which includes Planning, Looking, Analyzing, Training and Enabling Staff to perform at top proficiency levels.
Basic Intravenous and Phlebotomy Procedures	A six-hour course that provides in-depth information related to care of a resident with IV therapy and practice/competency training in venipuncture techniques and care of central lines.
Continuous Quality Improvement for Community Based Care Facilities	A six-hour workshop specific to Community Based Care Facilities (ALF's and RCF's) Managers and Directors. Participants will learn the basics of Continuous Quality Improvement (CQI), learn how to implement the program and assess their staff's readiness for CQI. In addition, participants will review common survey citations and learn how to translate these into CQI action plans.
Nursing Management in Community-Based Care	A fourteen hour course designed specifically for nurses who work, wish to work or provide some type of consultation to Community Based Care Facilities (ALF's, RCF's and Memory Care). Participants will review the philosophical view and role a nurse plays as well as regulations and standards of practice. Barriers and solutions to an effective nursing and health care monitoring program will be discussed.

DEMETRIA P. HAFFENREFFER, RN, MBA

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LEGAL EXPERT SERVICES

The following are law firms to which I have provided expert review and/or testimony:

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